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CJ-16-3263

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IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

WALTER MCCOWN, as Attorney in Fact for)
Sammie McCown,)
Plaintiff,)
vs.)
ALLSTATE INSURANCE COMPANY,)
Defendant.)

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

JUN 28 2016

Case No.

RICK WARREN
COURT CLERK
36

CJ-2016-3263

PETITION

Plaintiff, for his Petition against Defendant, states:

(1) Defendant sold Plaintiff, Sammie McCown, condominium policy, No. 010905294.

While insured under the policy, Plaintiff's condominium was damaged when a pipe broke.

(2) Plaintiff submitted a claim, which Defendant denied, saying she would have to look first for coverage under a policy on the condominium complex. Plaintiff told Defendant that the condominium policy had already told her it would not provide coverage for the claim, yet still Defendant, without so much as sending an adjuster to investigate the claim, denied it outright. Defendant breached the contract, and did so in bad faith, taking advantage of its elderly insured.

WHEREFORE, Plaintiff prays judgment against Defendant for \$11,000 on the contract claim, plus an amount in excess of \$75,000 on the tort claim, and, pursuant to 36 O.S. § 3629, interest at 15%, attorney's fee and costs, and all other appropriate relief.

Respectfully submitted,

Rex Travis

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